REMARKS

Claims 107, 109-126, 128-137, and 139-148 are currently pending in the application. Of these claims, claims 107, 126, and 137 are independent.

Prior Art Rejections

In the Office Action, claims 107-110, 115, 118, 122-129, 134, 137-140, 145, and 148 are rejected under 35 U.S.C. § 102(b) as being anticipated by UK Patent Application GB 2 286 267 A to Cohn et al. ("Cohn").

Claims 111-114, 119-121, 130-133, and 141-144 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Cohn.

Claims 116-117, 135-136, and 146-147 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Cohn in view of IBM Technical Disclosure Bulletin NN9411421 ("TDB").

Because claims 108, 127, and 138 have been canceled without prejudice or disclaimer, Applicant respectfully submits the rejections of these claims are no longer applicable.

Applicant respectfully traverses the remaining rejections as follows.

Independent claims 107 and 126 recite queuing one or more operations for a rotating storage device while the rotating storage device is spun down.

Independent claim 137 recites queuing one or more disk operations while a hard disk drive is spun down.

Applicant respectfully submits neither Cohn nor TDB, whether alone or in any obvious combination with one another, taught or suggested such feature(s) as claimed.

More particularly, Applicant respectfully submits that Cohn taught that destaging is performed by arranging sectors in the New state in cache memory 106 in a Destaging Order and transferring such sectors from cache memory 106 to disk 104 in the Destaging Order. See, e.g., Cohn on page 10 at lines 33-35 and on page 11 at lines 10-16 and 29-32. Cohn also taught that destaging occurs when a read or write request gives rise to an access to disk 104 and that destaging is performed only when disk 104 is spinning. See, e.g., Cohn on page 11 at lines 1-2

and 17-19. Applicant therefore respectfully submits that the arranging of sectors in a Destaging Order does not occur while disk 104 is spun down.

Noting the remaining rejected claims depend from independent claim 107, 126, or 137, Applicant therefore respectfully submits these rejections have been overcome and should accordingly be withdrawn.

Note that there may be additional reasons for the patentability of claims. For example, there may be additional reasons why the dependent claims are patentable.

It is respectfully submitted this patent application is in condition for allowance, for which early action is earnestly solicited.

The Examiner is invited to telephone the undersigned to help expedite the prosecution of this patent application.

Respectfully submitted,

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